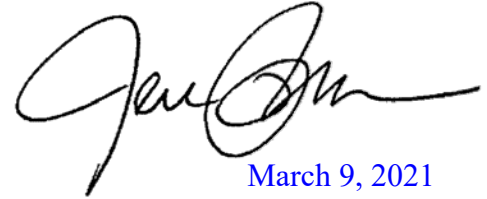


Application GRANTED. The Clerk of Court
is directed to terminate ECF No. 542.

March 9, 2021

The Honorable Jesse M. Furman
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

SO ORDERED.



March 9, 2021

Re: *City of Providence, Rhode Island v. Bats Global Markets, Inc.*, Case 1:14-cv-02811-JMF—**Defendants’ Unopposed Letter-Motion to Take 30(b)(6) Depositions of Plaintiffs’ Counsel After the Close of Fact Discovery**

Dear Judge Furman:

Defendants respectfully request that the Court either (a) grant leave for Defendants to take the Rule 30(b)(6) depositions of Lead Counsel (*see* ECF 508) after the March 12, 2021 deadline for fact discovery or (b) confirm that leave is unnecessary. Plaintiffs do not oppose these depositions being taken after March 12, 2021.

This request is necessary because, on March 2, 2021, less than 48 hours before the depositions were scheduled to begin based on the parties’ written agreement, Lead Counsel informed Defendants that their designees were no longer available on the agreed-upon dates.¹ Lead Counsel have offered these witnesses on March 24 (Topics 1-4) and March 25 (Topic 5), which is acceptable to Defendants.

Defendants do not believe that the rescheduling of these depositions necessitates any change to the deadlines set by the Court’s scheduling order.

Respectfully submitted,

¹ On February 11, 2021, Lead Counsel emailed Defendants as follows: “we will put up one designee on topic 5 for the three firms on March 4th, and will also put up one or more designees on March 5th ... to cover the other topics.” Email from C. Rhodes (Feb. 11, 2021). On March 2, 2021, Lead Counsel emailed Defendants and stated that dates would be reversed: The designee on Topics 1-4 would be made available on March 4, and the designee for Topic 5 would be made available on March 5. Email of S. Jodlowski (Mar. 2, 2021).

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cc: All Counsel of Record via ECF